

A34-0012

***National
Environmental
Achievement Track
Application Form***

IBM San Jose

Name of facility

N/A

Name of parent company (if any)

5600 Cottle Road

Street address

Street address (cont.)

San Jose, CA 95193

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Jim Dumanowski

Title Manager, Environmental Programs

Phone 408/256-5345

Fax 408/256-1779

E-mail dumanows@us.ibm.com

Section A

Tell us about your facility.

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

IBM San Jose is the headquarters of the Storage Technology Division (STD) of Technology Group (TG) and the Storage Subsystems Development (SSD) organization of Storage Systems Group (SSG). STD is responsible for manufacturing all storage products and for developing and marketing disk drives, OEM and attachment products worldwide.

IBM San Jose focuses on providing industry-leading storage technology products for IBM customers and original equipment manufacturers (OEMs). The site develops and does part of the manufacturing for thin film magnetic recording heads, tape heads, thin film storage disks, hard disk drives, and tape control units/libraries. IBM San Jose has development and product launch responsibility for DASD (Direct Access Storage Device) arrays/subsystems and houses a growing segment of IBM Global services personnel.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC

3572

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☒ More than 1,000

Section A, continued

- 5 Does your facility have an EPA ID number(s)?

☒ Yes ☐ No

If yes, list in the right-hand column.

CAD990843989

- 6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

See attached Checklist.

- 7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

- 8 Optional: Is there anything else you would like to tell us about your facility?

See attachment

Section B

Tell us about your EMS

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ----- ☒ Yes

b. Planning ----- ☒ Yes

c. Implementation and operation ----- ☒ Yes

d. Checking and corrective action ----- ☒ Yes

e. Management review ----- ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use? ☒ Self-assessment

☐ GEMI ☒ Other
CEMP See note

☒ Third-party assessment

☒ ISO 14001 Certification:
Last BVQI Audit May 2000
☒ Other: IBM Corporate Internal
Audit, February 1998
See note

Note: IBM Professional Self Assessment - internal protocol
Location Internal EMS (ISO 14001)
Real Estate and Site Operations Peer Review
IBM Corporate Internal Audit - Independent organization within IBM

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Non-Hazardous Waste	1,782.4	Tons	1,363.3	Tons
<p>i. How is the current level an improvement over the previous level? 23.5% reduction in non-hazardous solid waste sent offsite for treatment and/or disposal.</p> <hr/> <hr/> <hr/>				
<p>ii. How did you achieve this improvement?</p> <hr/> <p>During the past two years, IBM SJ implemented several new programs to recycle/reuse non-hazardous solid wastes streams traditionally sent for treatment/disposal. In addition to the typical commodities, we recycle waste sodium bicarbonate, clean construction debris, toner cartridges, clean cafeteria wastes, glass & aluminum disks, plastics & metals from scrapped products, etc.</p> <hr/> <p>IBM SJ also has an aggressive education /outreach program to increase awareness & participation.</p>				

Section C, continued

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Energy Consumption (Conservation)	15,000	MWh conserved	13,619	MWh conserved
<p>i. How is the current level an improvement over the previous level?</p> <p>In each year (1997 through 1999), IBM SJ exceeded its commitment to conserve 4% of the prior years' energy consumption. In 1997, the value represents a 5.0% conservation rate; in 1998 IBM San Jose achieved a 4.8% conservation rate; and in 1999 we achieved a 4.6% conservation rate.</p>				
<p>ii. How did you achieve this improvement?</p> <p>IBM SJ invested in a number of energy saving projects including lighting replacements; chiller, cooling tower, HVAC and controller upgrades; etc. IBM SJ also has an aggressive education/outreach program to increase awareness & participation in energy conservation efforts.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

a.	What is the aspect?	<u>Energy Consumption (Conservation)</u>	
b.	Is this aspect identified as significant in your EMS?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
c.	What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	<input checked="" type="checkbox"/> Option A: Absolute value <input type="checkbox"/> Option B: In terms of units of production or output	In 1999: USE: 293,207.00 MWh of electricity, 166,908.00 MWh of natural gas, 2,845 MWh of fuel oil <u>Quantity/Units)</u> <u>(Quantity/Units)</u>

Section C, continued

- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: See section e below
Absolute value (Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement?
- Commitment to conserve 4% of current year's total energy use through various energy-saving practices, capital investment in energy-conserving equipment, & employee education.
2000 conservation target: 11,728 MWh

Second aspect you've selected

- a. What is the aspect?
- Total Non-Hazardous Waste (Recycle Rate)
- b. Is this aspect identified as significant in your EMS?
- ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: In 1999:
Absolute value 4,650 tons recycled
(Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: See section e below
Absolute value (Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- e. How will you achieve this improvement?
- Commitment to recycle at least 70% (average) of non-hazardous waste generated by (1) seeking recycling opportunities for key waste streams & (2) educating employees & contractors about their roles/responsibilities.
Cannot provide tons to be recycled until waste generated for the year is known.

Section C, continued

Third aspect you've selected

- a.* What is the aspect? Air Emissions: NOx reductions (employee transportation)
- b.* Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c.* What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: 1.3 tons avoided
Absolute value (Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- d.* What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: 1.45 tons avoided
Absolute value per year, on average (Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- e.* How will you achieve this improvement? Commitment: average per year 2000 through 2002. Accomplish by increasing employee public transit use by offering transit subsidies, incentives and education/outreach.

Fourth aspect you've selected

- a.* What is the aspect? Products: Recyclability and Reuse (Related Waste to Landfill)
- b.* Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c.* What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A: 9.88 metric tons
Absolute value (Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- d.* What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: 10% less per year -- see section e below
Absolute value (Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)
- e.* How will you achieve this improvement? Targets: 2000: 8.9 metric tons
2001: 8.0 metric tons; 2002: 7.2 metric tons.
Accomplished by seeking recycling opportunities for key waste streams.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

Identification: annual community survey by local trade associations to identify top environmental priorities; monitoring local news; site complaint & information request response systems; employee input; employee Customer Care fairs.

Response through: EMS cycle; education/outreach; internal/external communications programs.

2 How do you inform community members of important matters that affect them?

Through mailings to interested parties lists; notices in local newspaper ; award applications; notices posted in key locations on the plant site (asbestos/lead/Prop 65 warnings; drinking water quality, environmental achievements, Spare the Air days, etc.)

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website <http://www.ibm.com/ibm/Environment/>

☐ Newspaper

☐ Open Houses

☐ Other
Information will be available on the Corporate Internet Web Site.

Section D, continued

4 Are there any ongoing citizen suits against your facility?

☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below.

	Organization	Name	Phone number
<i>Representative of a Community/ Citizen Group</i>	Pacific Institute	Jason Morrison	510/251-1600
<i>State/Local regulator</i>	California Environmental Protection Agency	Robert Stephens, PhD	510/540-3003
<i>Other community/local reference</i>	Silicon Valley Manufacturing Group	Carl Guardino, President and CEO	408/501-7864

Section E

Application and Participation Statement.

On behalf of IBM San Jose

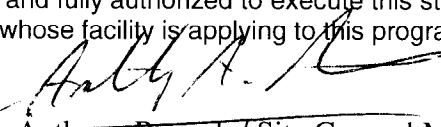
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date  09/19/2000
Printed Name/Title Anthony Razouk / Site General Manager
Facility Name IBM San Jose

Facility Street Address 5600 Cottle Road, San Jose, CA 95193
Facility ID Numbers CAD990843989

National Environmental Achievement Track

Environmental Requirements Checklist

The following *Checklist* is provided to assist facilities in answering *Section A, Tell us about Your facility, Question 6*. The *Checklist* is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The *Checklist* is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this *Checklist* and choose to submit it with your application, fill in your facility information below and enclose the completed *Checklist* with your application (see instructions).

Facility Name: IBM San Jose

Facility Location: 5600 Cottle Road, San Jose, CA 95193

Facility ID Number(s) CAD990843989
(attach additional sheets if necessary)

Check All
That Apply

Air Pollution Regulations

- | | |
|---|---|
| 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) | X |
| 2. Permits and Registration of Air Pollution Sources | X |
| 3. General Emission Standards, Prohibitions and Restrictions | X |
| 4. Control of Incinerators | |
| 5. Process Industry Emission Standards | |
| 6. Control of Fuel Burning Equipment | X |
| 7. Control of VOCs | X |
| 8. Sampling, Testing and Reporting | X |
| 9. Visible Emissions Standards | X |
| 10. Control of Fugitive Dust | |
| 11. Toxic Air Pollutants Control | |
| 12. Vehicle Emissions Inspections and Testing | |

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above
(identify)

- | | |
|--|----------|
| 13. <u>Ozone Depleting Substances (40 CFR 82.102, 82.152)</u> | <u>X</u> |
| 14. <u>California Clean Air Act (CA H&SC 39000, et seq.)</u> | <u>X</u> |
| 15. <u>Bay Area Air Quality Management District Regulations 1-12</u> | <u>X</u> |

Hazardous Waste Management Regulations

1.	Identification and Listing of Hazardous Waste (40 CFR 261)	X
	- Characteristic Waste	X
	- Listed Waste	X
2.	Standards Applicable to Generators of Hazardous Waste (40 CFR 262)	X
	- Manifesting	X
	- Pre-transport requirements	X
	- Record keeping/reporting	X
3.	Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)	
	- Transfer facility requirements	
	- Manifest system and record-keeping	
	- Hazardous waste discharges	
4.	Standards for Owners and Operators of TSD Facilities (40 CFR 264)	X
	- General facility standards	X
	- Preparedness and prevention	X
	- Contingency plan and emergency procedures	X
	- Manifest system, Record keeping and reporting	X
	- Groundwater protection	X
	- Financial requirements	X
	- Use and management of containers	X
	- Tanks	X
	- Waste piles	
	- Land treatment	
	- Incinerators	
5.	Interim Status Standards for TSD Owners and Operators (40 CFR 265)	
6.	Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)	
7.	Administered Permit Program (Part B) (40 CFR 270)	X

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

8.	<u>Hazardous Waste Control Law (CA H&SC 25100, et seq.; CCR Title 22)</u>	<u>X</u>
9.	<u>Hazardous Waste Source Reduction & Management Review Act (CA H&SC 25244.12, et seq.; CCR Title 22)</u>	<u>X</u>
10.	<u>Environmental Health Standards for the Management of Hazardous Waste (CCR Title 22)</u>	<u>X</u>
11.	<u>Medical Waste Management Act (CA H&SC 117915-118350; 25015-25099)</u>	<u>X</u>

Hazardous Materials Management

- | | | |
|----|---|---|
| 1. | Control of Pollution by Oil and Hazardous Substances (33 CFR 153) | |
| 2. | Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) | X |
| 3. | Hazardous Materials Transportation Regulations (49 CFR 172-173) | X |
| 4. | Worker Right-to-Know Regulations (29 CFR 1910.1200) | X |
| 5. | Community Right-to-Know Regulations (40 CFR 350-372) | X |

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- | | | |
|----|---|---|
| 6. | Hazardous Material Release Response Plans and Inventory (CA H&SC 25500, et. seq.; CCR Title 19) | X |
| 7. | Hazardous Material Storage Ordinance/Fire Code (San Jose Municipal Code Chapter 17) | X |
-

Solid Waste Management

- | | |
|----|---|
| 1. | Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) |
| 2. | Permit Requirements for Solid Waste Disposal Facilities |
| 3. | Installation of Systems of Refuse Disposal |
| 4. | Solid Waste Storage and Removal Requirements |
| 5. | Disposal Requirements for Special Wastes |

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- | | |
|----|-------|
| 6. | _____ |
| 7. | _____ |

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)	X
2. Designation of Hazardous Substances (40 CFR 116)	
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)	X
4. NPDES Permit Requirements (40 CFR 122)	X
5. Toxic Pollutant Effluent Standards (40 CFR 129)	
6. General Pretreatment Regulations for Existing & New Sources (40 CFR 403)	X
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines And Standards (40 CFR 414)	
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)	
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)	
10. Water Quality Standards	X
11. Effluent Limitations for Direct Dischargers	
12. Permit Monitoring/Reporting Requirements	X
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants	
14. Collection, Handling, Processing of Sewage Sludge	
15. Oil Discharge Containment, Control and Cleanup	X
16. Standards Applicable to Indirect Discharges (Pretreatment)	X

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. <u>Porter-Cologne Water Quality Act (CCR Title 22)</u>	X
18. <u>Waste Water Discharge Ordinance (San Jose Municipal Code Title 15)</u>	X
19. <u>California Above Ground Storage of Petroleum (CA H&SC 25270-25270.13)</u>	X
20. <u>San Jose/Santa Clara Water Pollution Control Plant Discharge Permit</u>	X

Drinking Water Regulations

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)	
2. National Primary Drinking Water Standards (40 CFR 141)	X
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)	X
4. Permit Requirements for Appropriation /Use of Water from Surface or Subsurface Sources	
5. Underground Injection Control Requirements	
6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems	

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above (identify)

7. <u>California Safe Drinking Water Act (CA H&SC 4010, et. seq.; CCR Title 22)</u>	X
8. <u>Safe Drinking Water & Toxic Enforcement Act (CCR Title 22)</u>	X
9. <u>Water Supply Backflow Prevention (CCR Title 17)</u>	X
10. <u>CA Department of Health Service Water Supply Permit #02-05-96P-4300791</u>	X

Toxic Substances

- | | |
|--|---|
| 1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) | X |
| 2. Import and Export of Chemicals (40 CFR 707) | X |
| 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) | X |
| 4. Chemical Information Rules (40 CFR 712) | X |
| 5. Health and Safety Data Reporting (40 CFR 716) | X |
| 6. Pre-Manufacture Notifications (40 CFR 720) | X |
| 7. PCB Distribution Use, Storage and Disposal (40 CFR 761) | X |
| 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) | |
| 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) | |

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above
(*identify*)

- | | |
|--|---|
| 10. Significant New Uses of Chemical Substances (40 CFR 721) | X |
| 11. Water Treatment Chemicals (40 CFR 749) | X |
| 12. Asbestos (40 CFR 763) | X |

Pesticide Regulations

- | | |
|--|---|
| 1. FTFRA Pesticide Use Classification (40 CFR 162) | |
| 2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) | |
| 3. Certification of Pesticide Applications (40 CFR 17.1) | |
| 4. Pesticide Licensing Requirements | |
| 5. Labeling of Pesticides (40 CFR 156) | X |
| 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements | |
| 7. Disposal of Pesticide Containers | |
| 8. Restricted Use and Prohibited Pesticides | |

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (*identify*)

- | | |
|---|---|
| 9. Worker Protection Standard (40 CFR 170; CCR Title 3 Div 6) | X |
|---|---|

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (*identify*)

Hazardous Substances Account Act (CA H&SC 25340-25392) X

2. RCRA Corrective Action (*identify*)

X

San Francisco Bay Regional Water Quality Control Board Cleanup Orders 88-157 and 88-158 (5600 Cottle Road, San Jose, CA 95193)

Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration, Corrective Action Regulations Not Listed Above (*identify*)

3. _____
4. _____

The San Jose facility (IBM SJ) serves as the headquarters of IBM's Storage Technology Division (STD). The facility is responsible for the worldwide development, manufacture and marketing of computer storage components and systems and for providing leading storage technology products and solutions for IBM customers and original equipment manufacturers (OEM).

The facility manufactures thin film magnetic recording heads, tape heads, thin film storage disks, head disk drives, and tape libraries with product launch responsibility for DAS disk arrays and works closely with the IBM Tucson facility on the development of tape and disk storage subsystems, as well as optical storage.

In addition to STD, IBM SJ is home to a number of other IBM divisions, including the Storage Subsystems Division (SSD), IBM Global Services, Tivoli, Real Estate/Site Operations, and General Procurement. Site population is approximately 7,800, including IBM employees, vendors-on-premises and contractors.

The site consists of 351 acres, including 31 buildings (with a footprint of eight acres providing nearly 4 million square feet of manufacturing/office space), 158 acres of parking lots/roads, and 135 acres of landscaping and orchards.

IBM SJ's EMS was ISO14001-certified in 1997. Subsequently, we have successfully completed three surveillance audits by our third-party auditor. Through our EMS, IBM SJ develops site specific programs designed to meet or exceed all applicable environmental regulatory standards as well as IBM corporate standards and practices. For IBM SJ activities and services, these include applicable air, water, waste water, solid waste, hazardous waste, and other programs which comprise the site's overall EMS. Additionally, IBM SJ participates in identified voluntary commitments as well as local, non-regulatory initiatives, where applicable. For IBM SJ, these voluntary commitments have included or include:

- Elimination of CFC use in manufacturing processes prior to regulatory requirements,
- City of San Jose Nickel Initiative (reduction of mass discharge of nickel in site wastewater discharges),
- Participation in Spare-the-Air, EcoPass and Commuter Check programs, as part of a broader employee alternative commute program,
- Voluntary wastewater volume discharge reduction with the City of San Jose, and
- Participation in the California Environmental Protection Agency (Cal/EPA) ISO14001 Pilot Project to assist the agency in measuring the effect of EMSs on environmental performance and regulatory permit streamlining.

IBM SJ is also committed to environmental leadership in the design of its products and to achieving continual improvement in its EMS as it relates to products, as well. Through our EMS, we have established objectives and targets for STD and SSD products, taking into account the significant environmental aspects of these products, as well as IBM corporate and other requirements. IBM SJ efforts are incorporated in our environmentally conscious product program

which includes product packaging, design for disassembly and use of recycled and recyclable components in new products.

IBM SJ also shares the experience it has gained in designing and implementing an ISO14001-based EMS with other companies and groups. Numerous site visits, presentations and teleconferences have provided specific information to others related to how IBM SJ improved its existing EMS and environmental performance by adapting it to the specific requirements of the ISO14001 standard.